

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS NURSES
ASSOCIATION,

Plaintiff

v.

NORTH ADAMS REGIONAL
HOSPITAL,

Defendant

Civil Action No. 05-30145-MAP

**PLAINTIFF MASSACHUSETTS NURSES ASSOCIATION'S
ASSENTED-TO MOTION TO ENLARGE DEADLINE FOR FILING OPPOSITION
TO DEFENDANT'S MOTION FOR JUDGMENT ON THE PLEADINGS**

The Plaintiff, Massachusetts Nurses Association ("Association"), hereby moves for a further one-week enlargement of the deadline for filing its Opposition to the Motion for Judgment on the Pleadings or, in the Alternative, For Summary Judgment filed by the Defendant, North Adams Regional Hospital to August 5, 2005. There is good cause to grant this Motion, as the issues presented by the Defendant's Motion are complex, and will likely require the assembly of one or more affidavits with supporting materials, and as the enlargement requested is modest. The undersigned has conferred with counsel

for the Defendant by telephone on July 27, and counsel for the Defendant
ASSENTED to this request.

Respectfully submitted

On behalf of the Plaintiff,
Massachusetts Nurses Association

By its attorneys



Alan J. McDonald, BBO #330960
Mark A. Hickernell, BBO #638005
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Date: July 27, 2005

RULE 7.1 CERTIFICATION

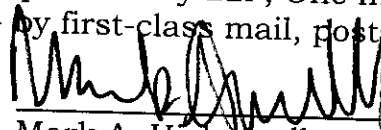
Pursuant to Local Rule 7.1(A)(2), counsel for Plaintiff Massachusetts Nurses Association conferred with Defendant North Adams Regional Hospital counsel, Robert Gordon, concerning this Motion, and obtained the Defendants assent thereto.



Mark A. Hickernell

CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2005, a true and accurate copy of the foregoing document was served upon counsel for the Defendant, Robert B. Gordon, Esq. and David C. Potter, Esq., Ropes & Gray LLP, One International Place, Boston Massachusetts 02110-2624 by first-class mail, postage prepaid.



Mark A. Hickernell